

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ELEV8 BALTIMORE, INC., *et al.*,
Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, *operating as*
AMERICORPS, *et al.*,
Defendants.

Civil Action No. 1:25-cv-01458
(MJM)

**CONSENT MOTION FOR EXPEDITED BRIEFING AND SCHEDULING OF A
HEARING ON PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs hereby move, pursuant to Federal Rule of Civil Procedure 6(c)(1) and Local Civil Rule 105.2, for an order establishing a briefing schedule on Plaintiffs' Motion for Preliminary Injunction. Plaintiffs ask that briefing be completed by June 6, 2025, and will propose hearing dates thereafter. The parties met and conferred, through counsel, and Defendants consent to the relief requested in this motion.

Absent action on this Motion, under the Local Rules, Defendants' Response to the Motion would be due on June 3, 2025 and Plaintiffs' Reply would be due on June 17, 2025. The expedited briefing is needed here to address this matter on a schedule that will mitigate the ongoing irreparable harms Plaintiffs face as a result of Defendants' constitutional, statutory, and administrative law violations, as described in both the Complaint and the Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction. ECF Nos. 1, 25.

Plaintiffs therefore request an order requiring Defendants to file any response to Plaintiffs' Motion for Preliminary Injunction on or before Friday, May 30, 2025 and requiring Plaintiffs to

file any reply on or before Friday, June 6, 2025. Plaintiffs will follow up with proposed hearing dates thereafter.

Dated: May 22, 2025

Respectfully submitted,

/s/ Norman L. Eisen

Norman L. Eisen [Bar No. 09460]
Tianna J. Mays [Bar No. 21597]
Pooja Chaudhuri [admitted PHV]
Sofia Fernandez Gold [admitted PHV]
Joshua Kolb [admitted PHV]
DEMOCRACY DEFENDERS FUND
600 Pennsylvania Avenue SE
Suite 15180
Washington, DC 20003
Tel: (202) 594-9958
Norman@statedemocracydefenders.org
Tianna@statedemocracydefenders.org
Pooja@statedemocracydefenders.org
Sofia@statedemocracydefenders.org
Joshua@statedemocracydefenders.org

Attorneys for All Plaintiffs

/s/ Elena S. Goldstein

Elena S. Goldstein [admitted PHV]
Skye Perryman*
**DEMOCRACY FORWARD
FOUNDATION**
P.O. Box 34553
Washington, D.C. 20043
Tel: (202) 448-9090
Fax: (202) 796-4426
egoldstein@democracyforward.org
sperryman@democracyforward.org

Attorneys for All Plaintiffs

/s/ Abbe David Lowell

Abbe David Lowell [Bar No. 11863]
Brenna L. Frey [admitted PHV]
Isabella M. Oishi [admitted PHV]
LOWELL & ASSOCIATES, PLLC
1250 H Street, N.W.
Second Floor
Washington, D.C. 20005
(202) 964-6110
ALowellpublicoutreach@lowellandassociates.com
BFrey@lowellandassociates.com
IOishi@lowellandassociates.com

Attorneys for All Plaintiffs

/s/ Teague P. Paterson

Teague P. Paterson*
Matthew S. Blumin*
Georgina C. Yeomans*
**AMERICAN FEDERATION OF STATE,
COUNTY, AND MUNICIPAL EMPLOYEES,
AFL-CIO**
1625 L. Street NW
Washington, DC 20036
Tel: (202) 775-5900
Fax: (202) 429-1293
TPaterson@afscme.org
MBlumin@afscme.org
GYeomans@afscme.org

*Attorneys for AMERICORPS EMPLOYEES
UNION, Local 2027 of the American Federation
of State, County, and Municipal Employees, AFL-
CIO*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22 day of May, 2025, a copy of the foregoing Consent Motion for Expedited Briefing and Scheduling of a Hearing on Plaintiffs' Motion For Preliminary Injunction was served electronically on all parties receiving service via CM/ECF in this case.

/s/ Abbe David Lowell

Abbe David Lowell [Bar No. 11863]